

## SEGAL STEWART CUTLER LINDSAY JANES & BERRY PLIC

Counselors at Law

1400 WATERFRONT PLAZA 323 WEST MAIN STREET LOUISVILLE, KENTUCKY 40202-4251

Telephone: (502) 568-5600 Fax: (502) 581-1437 E-mail: jfstewart@segal-lawfirm.com Attorneys. Herbert L. Segal \*\* John Frith Stewart Robert M. Lindsay Irwin H. Cutler, Jr. Raymond R. Roelandt Dennis Franklin Janes Adrienne A. Berry \*† J. Keith Smith

Laura Ellis Stoess Everett C. Hoffman o Juliette Stewart House ++ Thomas J. Grady Stephen C. Emery Kyle Anthony Burden Beach A. Craigmyle William Thomas Rump David O'Brien Suetholtz

Paralegals: Cindy Bauer Tanya Elder Jenny Linet Angie Burns

RECEIVED

JUL 1 9 2004

July 16, 2004

**PSC** Consumer Services

Beth O'Donnell, Executive Director **Public Service Commission** P.O. Box 615 Frankfort, KY 40601

2004-00250

RECEIVED

JUL 10 2004

PUBLIC STAVICE COMMISSION

RE: AFSCME Council 62 v. AT & T

Dear Ms. O'Donnell:

Enclosed is a copy of a signed complaint in the above referenced matter.

If you have any questions, please contact me.

Very truly yours,

John Frith Stewart

JFS/tav Encl.

cc:

Roger Poer

F:\Uohn\UNIONS\AFSCME\COUNCIL 62\AFSCME V AT&T\O'Donnell ltr 7-16-04.wpd

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## COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION

राष्ट्	ur Full Na	ne)	State Company of the state of t		
		COMPLAINANT			
VS. AT	& T		} JUL 1 0 2004		
· · · · · · · · · · · · · · · · · · ·		-	-} · PUBLIC SURVICE COMMISSION		
(Nai	ne of Utilit	DEFENDANT			
		COMPLAINT			
The comp	laint of _	AFSCME Council 62	room makkatta.		
		(Your Full Name)	respectfully shows:		
<b>(</b> a)	R	oger E. Poer, Controller			
		(Your Full Name)			
	142	4 N. Pennsylvania St., Indianapolis	i, IN 46202		
		(Your Address)			
(b)	A	t & T			
	(Name of Utility)				
	P.0	). Box 9001310, Louisville, KY 402	90-1310		
		(Address of Utility)			
(c)	That:	Apon changing physical locations in the	city of Louisville, in Contambour anno		
		(Describe here, attaching additional shee	ets if necessary.		
	our ph		ne service provider, Bell South, obtained a new		
•		the specific act, fully and clearly, or facts	that are the reason		
	numbe		ginning September, At&T began billing at , \$0.99		
		ALL AGSIZ TOLING COMPISION I	minute. In Feb. 2004 rate was increased to \$4.49		
		per previous rate of \$0.09 per	minute. In Feb. 2004 rate was increased to \$4.40		

Continued on Next Page

Formal Complaint			1
AFSCME Council 62 vs.	AT&T		
Page 2 of 2		•	
Repeated attempts in March and April2004, to	correct the billing v	were denied, w	ith the exception
of one month, which was credited to to the \$0			
•			
Wherefore to live to a first to the second t			
Wherefore, complainant asks Refund of esti	mated overbilling \$7 y state the relief des	7,396.89. (Se	ee attached)
This would represent the rollback of the charges t	O Our previous rate	ered.)	
\$4.49 charged to our account, that have been provide	o our brevious rate (	or \$0.09 per m	inute from \$0.99
\$4.49 charged to our account, that have been previous	ously paid. The billi	ng detail is not	disputed, only
rate per can.			
Dated at Louisville Kentucky,	this 7th day	v	
(Tour City)	•		•
of May 2004 , PXX (Month)			
	11	Arsca	es Caba
-/Lon	ur Signature)	CONTRA	100
. <i>U</i>	1400 Waleswart, 323 W. Main	terfant 641	174
(Na	ne and address of a	ittorney, if any)	KY 40202-4251
Do	n Pull Stur	I, all	<i>D</i> .
(/3.		w street,	hould, &
•	4020	02	

AFSSCME Council 62 AT & T Louisville Office Over-Billed

Account # 057-090-1698-001 Phone # 502-363-4074

		00. at 66.) III	
	st. Should	Credit for 12/22/2003 Bill (.99 to .09 150.00 Estimate @ .09 123.54 Estimate @ .09 129.83 Estimate @ .09 220.93 Estimate @ .09 244.33 Estimate @ .09 247.28 Estimate @ .09	9,560.05 Over billed
	Est. Should	N/A 150.00 123.54 129.83 220.93 244.33 127.28	1,062.23
	Status of Bill	Un-paid Un-paid Paid Paid Paid Paid	Paid Die AFSCME
	Gents Amount Per Minute	(921.62) NA 3,084.78 \$4.49 & .99 1,235.40 0.99 1,298.31 0.99 2,209.28 0.99 2,443.34 0.99 1,272.79 0.99	
	Amount	(921.62) 3,084.78 { 1,235.40 1,298.31 2,209.28 2,443.34 1,272.79	10,622.28
Bill Close	Dafe	3/22/2004 2/22/2004 1/22/2004 12/22/2003 11/22/2003 10/22/2003	Totals